


DECLARATION OF RICHARD BUTLER

I, Richard Butler, swear and declare as follows:

1. I am over 18 years old and a resident of Lake Worth, Florida.
2. I am the Managing Director of DermaCare Packaging & Private Label, LLC in Delray Beach, Florida. DermaCare is an authorized distributor of the FlowFlex Covid-19 home test kit.
3. On December 29, 2021, I met with Mr. Omri Shafran and Mr. Omri Abu for the first time at Delray Beach Executive Suites, located at 301 W. Atlantic Ave, 2nd Floor Corporate Office, Suite 5, Delray Beach, FL 33444.
4. The purpose of this meeting was to discuss a potential purchase order from Texas Medical Technology, LLC ("TMT") for a large number of Covid-19 Test Kits from DermaCare.
5. There was no deal or agreement in place between DermaCare and TMT, Mr. Omri Shafran, or Mr. Omri Abu prior to December 29, 2021. TMT placed their first order with DermaCare on December 30, 2021. We had not even reached an informal agreement before the in-person meeting in Florida on December 29.
6. On January 2, 2022, I received text messages from Ms. Henya Hertzelt, telephone number 561-929-7566, an employee of TMT.
7. In her messages, Ms. Hertzelt requested confirmation that DermaCare had received TMT's wire payment for purchase orders of the FlowFlex Covid-19 Test Kits.
8. On February 1 and 2, 2022, I received additional text messages from Ms. Hertzelt informing me that she had obtained information about DermaCare's recent shipment purchase orders, order quantities, and delivery information to DermaCare's warehouse in Vernon, CA. These messages were aggressive in tone and threatening.
9. Attached hereto as Exhibit A is a true and correct copy, by screenshot, of the February 1 and 2 text messages.
10. Ms. Hertzelt indicated that she obtained this information directly from ACON Laboratories, Inc., the manufacturer of FlowFlex test kits.
11. Attached hereto as Exhibit B is a true and correct copy, by screenshot, of an email from Mr. Glenn Mitchell, US National Accounts Manager for ACON, dated February 2, 2022, stating that Ms. Hertzelt from Texas Medical Technologies had called ACON and stated that DermaCare is a "scammer" that "took her 2 million."
12. Based on information available online, her LinkedIn profile, and her Palm Beach County area code, I understand Ms. Hertzelt to reside in Florida.
13. Attached hereto as Exhibit C is a true and correct copy of Ms. Hertzelt's LinkedIn profile.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Dated: May 24, 2022

Signed: 
Richard Butler